

Mark S. Popofsky (SBN 175476)
 Mark.Popofsky@ropesgray.com
 ROPES & GRAY LLP
 One Metro Center
 700 12th Street NW, Suite 900
 Washington, DC 20005-3948
 Telephone: (202) 508-4600
 Facsimile: (202) 508-4650

Jane E. Willis (*pro hac vice*)
 Jane.Willis@ropesgray.com
 ROPES & GRAY LLP
 Prudential Tower
 800 Boylston Street
 Boston, MA 02199-3600
 Telephone: (617) 951-7000
 Facsimile: (617) 951-7050

Michelle L. Visser (SBN 277509)
 Michelle.Visser@ropesgray.com
 ROPES & GRAY LLP
 Three Embarcadero Center
 San Francisco, CA 94111-4006
 Telephone: (415) 315-6300
 Facsimile: (415) 315-6500

Attorneys for Defendants
 Hitachi-LG Data Storage, Inc. &
 Hitachi-LG Data Storage Korea, Inc.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

IN RE: OPTICAL DISK DRIVE PRODUCTS
 ANTITRUST LITIGATION

MDL NO. 10-MD-02143-RS

CASE NO. 13-CV-1877-RS

This Document Relates to:

STATE OF FLORIDA, OFFICE OF THE
 ATTORNEY GENERAL, DEPARTMENT OF
 LEGAL AFFAIRS,

DEFENDANTS HITACHI-LG DATA
 STORAGE, INC. AND HITACHI-LG
 DATA STORAGE KOREA, INC.'S
 ADMINISTRATIVE MOTION TO FILE
 PORTIONS OF ANSWER UNDER SEAL

Plaintiff,

Hon. Richard Seeborg

v.

[Civil L.R. 7-11 and 79-5(d)-(e)]

HITACHI-LG DATA STORAGE, INC., et al.

[Declaration of Michelle L. Visser; Proposed
 Order; and Redacted and Unredacted
 Versions of Document Sought to Be Sealed
 Filed Concurrently]

Defendants.

Pursuant to Civil Local Rules 7-11 and 79-5(d)-(e), and in accordance with this Court's General Order No. 62, Electronic Filing of Documents Under Seal, effective May 10, 2010, and its Revised Stipulated Protective Order ("Protective Order") [Dkt. 923] issued on June 24, 2013 in the above-referenced multidistrict litigation, Defendants Hitachi-LG Data Storage, Inc. ("HLDS") and Hitachi-LG Data Storage Korea, Inc. ("HLDS Korea") (together, the "HLDS Defendants") hereby move the Court for leave to file portions of their Answer to the State of Florida's ("Florida") Second Amended Complaint for Damages, Civil Penalties, and Injunctive Relief ("Answer") under seal because they contain purported quotations, analysis of, references to, or information taken or derived from documents that other defendants have designated "CONFIDENTIAL" or "CONFIDENTIAL-RESTRICTED."

This motion is supported by the Declaration of Michelle L. Visser in Support of Defendants Hitachi-LG Data Storage, Inc. and Hitachi-LG Data Storage Korea, Inc.'s Administrative Motion to File Portions of Answer Under Seal.

Civil Local Rules 79-5 governs the filing under seal of entire documents or portions of documents that contain material that is "privileged, protectable as a trade secret or otherwise entitled to protection under the law." Civ. L. R. 79-5(b). Rule 79-5(e) provides, "[if] the Submitting Party is seeking to file under seal a document designated as confidential by the opposing party or a non-party pursuant to a protective order, or a document containing information so designated by an opposing party or a non-party, the Submitting Party's declaration in support of the Administrative Motion to File Under Seal must identify the document or portions thereof which contain the designated confidential material and identify the party that has designated the material as confidential ('the Designating Party')." The Protective Order in this action permits parties to designate documents as "CONFIDENTIAL" or "CONFIDENTIAL-RESTRICTED" and defines "Protected Material" to include "any Disclosure

1 or Discovery Material that is designated as ‘CONFIDENTIAL.’”¹ The Protective Order also
 2 provides that “a Party may not file in the public record in this action any Protected Material.”²

3 On May 19, 2014, the State of Florida filed its Second Amended Complaint for Damages,
 4 Civil Penalties, and Injunctive Relief (“Complaint”) [Dkt. 1270-3, 1270-4], as well as an
 5 administrative motion pursuant to Civil Local Rules 7-11 and 79-5 to file under seal portions of
 6 paragraphs 76, 78, 107-133, 152-160, and 254 of the Complaint [Dkt. 1270], because, *inter alia*,
 7 information in paragraphs 76, 78, 107-133, and 152-160 “is identical to the information already
 8 ordered sealed by this Court in its Order Granting Plaintiff State of Florida’s Administrative
 9 Motion to File Under Seal Amended Complaint for Damages, Civil Penalties, Injunctive Relief,
 10 entered October 9, 2013, (Master Dkt. 1017),” and because “[l]imited portions of paragraph 254 .
 11 . . . contain information produced by defendants containing transactional data designated as
 12 ‘Confidential’ or ‘Confidential-Restricted.’”³

13 Accordingly, the HLDS Defendants hereby move this Court for permission to file under
 14 seal the following portions of the Answer:

- 15 • Page 28, lines 6-7, 12-13, 21-27;
- 16 • Page 29, lines 5-7, 12-14, 20-22, 24-26;
- 17 • Page 30, lines 1-4, 9-11, 16-17, 22-24;
- 18 • Page 31, lines 3-5, 9-10, 15-17, 22-24;
- 19 • Page 32, lines 1-3, 8-9, 14-16, 20-21, 26-27;
- 20 • Page 33, lines 5-7, 11-16, 21-23;
- 21 • Page 34, lines 1-2, 7-8, 13-14, 19-20, 25-26;
- 22 • Page 39, lines 7-9, 14-15, 27;

23
 24 ¹ Protective Order at §§ 2.14, 5, 7.2(c).

25 ² Protective Order at § 13.3.

26 ³ Plaintiff State of Florida’s Administrative Motion to File Under Seal Second Amended
 27 Complaint for Damages, Civil Penalties, and Injunctive Relief, May 19, 2014, Dkt. 1270, at 2-3.
 As of the date of this filing, the Court has not ruled on Florida’s administrative motion.

- Page 40, lines 1-4, 7-9, 13-15, 23-27;
- Page 41, lines 2-6, 9-11; and
- Page 64, lines 8-10.

The portions of the Answer which are requested to be sealed either quote or describe portions of the Complaint that Florida moved to be sealed and that Florida represented contained identical information to information already ordered sealed by this Court or information that was otherwise designated “CONFIDENTIAL” OR “CONFIDENTIAL-RESTRICTED” pursuant to the Protective Order.

Pursuant to Civil Local Rule 79-5(e), the HLDS Defendants state that because neither Florida’s Complaint nor Florida’s Motion to Seal identify the parties that have designated the material as “CONFIDENTIAL” or “CONFIDENTIAL-RESTRICTED,” the HLDS Defendants are not in a position to identify such parties.

Respectfully submitted,

THE HLDS DEFENDANTS,

By their attorneys,

By: /s/ Michelle L. Visser

Mark S. Popofsky
ROPES & GRAY LLP
One Metro Center
700 12th Street NW, Suite 900
Washington, D.C. 20005-3948
Telephone: (202) 508-4600
Facsimile: (202) 508-4650

Jane E. Willis (*pro hac vice*)
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Michelle L. Visser
ROPES & GRAY LLP
Three Embarcadero Center
San Francisco, CA 94111-4006
Telephone: (415) 315-6300
Facsimile: (415) 315-6350

Dated: June 18, 2014